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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

NOEL C. MURRAY and DR. SWARNA  
PERERA, on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

PROVIDENT TRUST GROUP, LLC, and  
ASCENSUS, LLC,

Defendants.

Case No.: 2:18-cv-01382-MMD-GWF

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND THE TIME FOR  
DEFENDANTS TO RESPOND TO  
COMPLAINT**

Plaintiffs Noel C. Murray and Dr. Swarna Perera ("Plaintiffs"), by and through their counsel of record, the Law Office of Hayes & Welsh and the Law Office of Christopher J. Gray, P.C., and Defendants Provident Trust Group, LLC, and Ascensus, LLC, by and through their counsel of record, Greenberg Traurig, LLP, and Groom Law Group, Chartered, stipulate and request that the Court extend the time by which Defendants must respond to the Complaint by forty-five (45) days up to, and including, **October 8, 2018**. This Stipulation is made and based upon the following:

1. Plaintiffs filed their Complaint on July 26, 2018, in which they allege Defendants breached their contractual and fiduciary duties as trustees and custodians of Plaintiffs' Individual Retirement Accounts. ECF No. 1. Plaintiffs seek certification to represent a class of similarly situated individuals across the country. *Id.*
2. Defendants were served with the Complaint on August 2, 2018. ECF No. 7. Defendants' response is currently due August 23, 2018. *Id.*
3. Counsel for Defendants have recently been engaged and require additional time to evaluate Plaintiffs' allegations and prepare a response, taking into account the exercise of due diligence.
4. In light of the foregoing, the parties agree that Defendants shall have up to, and including, **October 8, 2018**, to respond to the Complaint.
5. This is the first request for an extension of time. This Stipulation is entered into in good faith and not for purposes of delay.

DATED this 20th day of August, 2018.

/s/ Jason Hicks  
Mark F. Ferrario, Esq.  
Jason K. Hicks, Esq.  
GREENBERG TRAURIG, LLP

Michael J. Prame, Esq.  
Sarah M. Martin, Esq.  
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*Attorneys for Defendants*

DATED this 20th day of August, 2018.

/s/ Christopher Gray  
Martin L. Welsh, Esq.  
LAW OFFICE OF HAYES & WELSH

Christopher J. Gray, Esq.  
Michael Giarrusso, Esq.  
LAW OFFICE OF CHRISTOPHER J. GRAY  
*Attorneys for Plaintiffs*

IT IS SO ORDERED.

George Foley Jr.  
UNITED STATES MAGISTRATE JUDGE

DATED: 8-21-2018